



Association of Veterinarians for Animal Rights

Committed to balancing the needs of nonhuman animals with those of human animals

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Washington, DC 20250-3700

September 2, 1999

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Re: Docket No. 98-045N

To Whom It May Concern:

I am submitting comments regarding food safety issues on behalf of the Association of Veterinarians for Animal Rights (AVAR), a national organization of veterinarians, veterinary medical students and technicians.

The United States Department of Agriculture (USDA) cannot resolve the many issues of **food** safety unless it addresses the conditions under which animals used for food are raised. Regulatory authority must be developed at the farm level, the conditions under which animals are raised must be improved, and there must be stricter oversight at slaughterhouses. Additionally, the use of antibiotics to prevent disease and promote growth is a serious public health threat.

Crowding: Animals used for **food** are generally raised in very crowded, inhumane conditions. This is done for economic gain for the producer. These stressful conditions preclude these animals to various diseases.

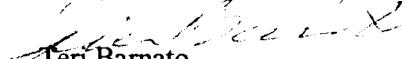
Forced Molting: Forced molting of 'layer' birds must be halted immediately. Forced molting is a practice widely used by the egg industry whereby hens are starved for an average of 10 - 14 days, causing a 25 percent to 35 percent loss in body weight, to increase egg production. An estimated 1.5 percent of these birds die each year as a result. These birds are so stressed out that their immune systems are severely compromised, thus perpetuating the development of *Salmonella enteritidis*. In fact, according to Egg Industry Magazine of June 1999: 'Reduced feed and water intake is the most detrimental and universal aspect of disease.' The USDA's own research shows that forced molting increases the transmission of *Salmonella enteritidis* to both hens and their eggs, thus placing consumers at serious risk.

Antibiotics: Approximately 50 percent of all antibiotics manufactured in the United States are used by the animal agriculture industry. These drugs are used to promote growth or prevent disease. Extra-label use of drugs needs further monitoring. Overuse of drugs has resulted in new strains of antibiotic-resistant bacteria. Additionally, prominent **health agencies** are concerned that antibiotic resistance in humans is growing and may be connected to antibiotics used by the animal agriculture industry.

Slaughterhouses: Line speeds need to be addressed, as well as the sanitation and handling of animals at slaughterhouses. The federal Humane Slaughter Act is not adequately enforced.

In short, the way animals used for food are raised and handled is inexcusable. This inhumanity is at all levels of animal agriculture and must be more **carefully** regulated if the USDA expects a safe food supply for people.

With reverence for all life,


Teri Barnato
National Director
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